Vernon H. Crockett
Chief, Industrial Hazardous Waste Branch
Land Division
Alabama Department of Environmental Management
1400 Coliseum Boulevard
Montgomery, Alabama 36110-2059

SUBJ: RCRA Compliance Evaluation Inspection
Safety Kleen Systems, Inc.
EPA ID Number: ALD981028798

Dear Mr. Crockett:

On April 16, 2019, the U.S. Environmental Protection Agency, along with the Alabama Department of Environmental Management, conducted a CEI at the Safety Kleen Systems, Inc. facility, located at 2221 Highway 72 East in Huntsville, Alabama, to determine the facility's compliance status with RCRA and applicable regulations.

Enclosed is the EPA RCRA inspection report, which indicates that potential deficiencies of RCRA were discovered during the inspection. Please follow-up with Safety Kleen Systems, Inc. to ensure the deficiencies have been addressed.

If you have any questions regarding this matter, please contact Paula Whiting, of my personnel, by phone at (404) 562-9277 or by email at [HYPERLINK "mailto:whiting.paula@epa.gov"].

Sincerely,

Alan A. Annicella
Chief, Land, Asbestos and Lead Section
Chemical Safety and Land Enforcement Branch
Enforcement and Compliance Assurance Division

Enclosure

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ralph Boyd
Branch General Manager
Safety Kleen Systems, Inc.
2221 Highway 72 East
Huntsville, Alabama 35016

SUBJ: RCRA Compliance Evaluation Inspection
Safety Kleen Systems, Inc.
EPA ID # ALD981028798

Dear Mr. Boyd:

On April 16, 2019, the U.S. Environmental Protection Agency, along with the Alabama Department of Environmental Management, conducted a CEI at Safety Kleen Systems, Inc. located at 2221 Highway 72 East, Huntsville, Alabama, to determine the facility's compliance status with RCRA and applicable regulations.

Enclosed is the EPA RCRA inspection report, which indicates that potential deficiencies of RCRA were discovered during the inspection. A copy of this report has been forwarded to the Alabama Department of Environmental Management for follow-up.

If you have any questions regarding this matter, please contact Paula Whiting by phone at (404) 562-9277 or by email at [HYPERLINK "mailto:whiting.paula@epa.gov."]

Sincerely,

Alan A. Annicella
Chief, Land, Asbestos and Lead Section
Chemical Safety and Land Enforcement Branch
Enforcement and Compliance Assurance Division

Enclosure

cc: Corey Holmes, Industrial Hazardous Waste Program, ADEM Land Division

RCRA Inspection Report

1) Inspectors and Authors of Report

Paula A. Whiting
Environmental Engineer
U.S. Environmental Protection Agency, Region 4
Land, Asbestos and Lead Section
Chemical Safety and Land Enforcement Branch
Enforcement and Compliance Assurance Division
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
(404) 562-9277

2) Facility Information

Safety Kleen Systems, Inc.
2221 Highway 72 East
Huntsville, Alabama 35016
Madison County
EPA ID: ALD981028798

3) Responsible Official

Ralph Boyd, Branch General Manager

4) Inspection Participants

Ralph Boyd	Safety Kleen Systems, Inc.
Corey Holmes	ADEM Land Division
Craig Schimmer	ADEM Land Division
Paula Whiting	US EPA Region 4 Atlanta

5) Date and Time of Inspection

April 16, 2019 at 9:00 a.m. CDT

6) Applicable Regulations

Subtitle C of the Resource Conservation and Recovery Act (RCRA) (42 U.S.C. §§ 6921 – 6939g), the Alabama Hazardous Waste Management and Minimization Act of 1978, Ala. Code § 22-30-1 *et seq.*; 40 Code of Federal Regulation (C.F.R.), Parts 260 - 270, 273 & 279, and rules 335-14-1 to 335-14-17 (2016 and 2018) of the Alabama Department of Environmental Management (ADEM) Administrative Code (ADEM Admin. Code).

As the State's authorized hazardous waste program operates in lieu of the federal RCRA program, the citations of those authorized provisions alleged herein will be to the authorized State program;

however, for ease of reference, the federal citations will follow in brackets.

Pursuant to ADEM Admin. Code r. 335-14-3-.01(7) [40 C.F.R. § 262.17], a LQG may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, as required by Section 22-30-12(b) of the AHWMMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], provided that the generator complies with the conditions listed in ADEM Admin. Code r. 335-14-3-.01(7) [40 C.F.R. § 262.17] (hereinafter referred to as the "LQG Permit Exemption").

Pursuant to ADEM Admin. Code r. 335-14-3-.01(5)(a) [40 C.F.R. § 262.15(a)], a generator may accumulate as much as 55 gallons of non-acute hazardous waste in containers at or near the point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or without having interim status, as required by Section 22-30-12(b) of the AHWMMA, Ala. Code § 22-30-12(b) [Section 3005 of RCRA, 42 U.S.C. § 6925], and without complying with ADEM Admin. Code r. 335-14-3-.01(6)(b) or 335-14-3-.01(7)(a) [40 C.F.R. § 262.16(b) or §262.17(a)], except as required in ADEM Admin. Code r. 335-14-3-.01(5)(a)7. and 8. [40 C.F.R. § 262.15(a)(7) and (8)], provided that the generator complies with the satellite accumulation area conditions listed in ADEM Admin. Code r. 335-14-3-.01(5)(a) [40 C.F.R. § 262.15(a)] (hereinafter referred to as the "SAA Permit Exemption").

7) Purpose of Inspection

The purpose of the inspection was to conduct an unannounced RCRA compliance evaluation inspection (CEI) to determine the compliance of Safety Kleen Systems, Inc., EPA ID# ALD981028798 with the applicable regulations.

8) Facility Description

In 2012, Clean Harbors acquired the SKS, Inc. used oil recycling and re-refining, and parts washer business.

Safety Kleen Systems, Inc., (SKS Huntsville) in Huntsville, Alabama is 10-day transfer facility that picks up hazardous, non-hazardous and universal wastes and used oil from industrial customers. Each load is sampled, analyzed and held until disposal. Once the waste is consolidated, the waste is then sent to other Clean Harbor Company hubs. SKS Huntsville also provides bulk and vacuum services for used oil, and parts washer equipment and solutions. The facility generates 1,500-2,000 pounds of hazardous waste from the drum washing procedures, and the retained samples.

SKS Huntsville is located on 10 acres with 4,500 square feet of storage area. SKS Huntsville employs approximately 14 employees. The facility operates 7 days per week, 8 hours per day and one shift.

SKS Huntsville's most recent Hazardous Waste Generator Notification (EPA Form 8700-12), dated June 25, 2018, characterized the facility as a large quantity generator (LQG) of hazardous waste.

Currently, SKS Huntsville generates used oil, universal wastes, spent solvent and other wastes which include EPA waste codes D001, D002, D004-D011, D018, D019, D021-D030, D032-D043, F002,

F003 and F005 wastes.

9) Previous Inspection History

This facility was previously inspected on June 13, 2018 by ADEM. No violations were found during the inspection.

10) Findings

At approximately 9:00 a.m. CDT, the EPA and ADEM inspectors arrived at the SKS Huntsville facility, presented their credentials to the front desk and signed in. Mr. Ralph Boyd, Branch General Manager greeted the inspectors and showed them to his office. Mr. Boyd met with the inspectors for an opening conference before escorting them around the facility. The inspectors presented their credentials to Mr. Boyd at 9:00 a.m. EDT.

At the opening conference, a brief explanation for the purpose of the inspection was given, as well as an introduction of the ADEM and EPA inspectors. The inspectors requested a description of the facility operations. The inspectors then performed a walk-through inspection of specific areas in the facility. Below is a description of the observations made during the walk-through.

10.1 Front Warehouse

The Front Warehouse stores product and equipment such as parts washers for sale. No hazardous waste was stored in this area.

10.2 Dumping Field

The Dumping Field is a grated secondary containment where the incoming spent solvent drums are lined up, and the dirty solvent is pumped out into a yellow tanker truck (Pictures 1-3). The dirty drums are put into a drum washer. If the drum held hazardous waste, then the drum is put in the spritzer and sprayed with Safety Kleen Premium Solvent 150. Once the drum is cleaned, the drum is refilled with new non-hazardous solvent.

The inspectors observed two 55-gallon satellite accumulation area (SAA) drums of Solvent Sludge – Branch Generated (Pictures 4-7). The drums were observed closed and labeled.

10.3 Warehouse

The Warehouse is where the incoming drums are stored before shipping out to other hubs (Pictures 8-11). The inspectors observed the following in the Warehouse (Pictures 8-21, 29):

- Red 55-gallon drums with non-hazardous solvent to be pumped out;
- Seven 250-gallon totes of non-hazardous waste;
- Six pallets of non-hazardous waste to be shipped to Clean Harbors in Chattanooga, TN;
- Three pallets of universal waste lamps that were shrink wrapped and ready to ship out to other hubs;
- Drums and totes of aqueous parts washer waste water that will sent to the Clean Harbor waste water treatment plant;
- Three 55-gallon drums of used oil filters next to a blue used oil container for drained filters; and
- Sixteen incoming hazardous waste containers arriving that morning waiting to be processed:

All containers were observed closed, labeled and dated.

10.4 Flammable Room

The Flammable Room was used to stage outgoing container loads, for storage of waste and oil samples for up to 3 months and as the branch less than 90-day hazardous waste storage area (HWSA). The inspectors observed container of hazardous flammable waste, universal waste lamp containers, a 55-gallon drum of purged hazardous oil samples that was open, a used oil tank, eleven 55-gallon drums of branch generated hazardous waste stacked on two pallets and three 35-gallon drums of branch generated hazardous waste (Pictures 22-28, 38-40). The HWSA containers were closed, labeled and dated. The oldest drum was dated February 8, 2019. The open purged samples container was immediately closed by the facility during the inspection.

10.5 Tanker Storage

Dirty solvent is stored in a 7,000-gallon yellow tanker (Pictures 30-31). The tanker sits inside a sloped secondary containment. The tanker was marked with a hazardous waste label and dated April 11, 2019. Mr. Boyd explained that the hazardous waste tanker would be shipped to Clean Harbors in Lexington, SC, pumped out, cleaned and refilled with clean solvent to distribute to their clients.

The silver tanker beside the hazardous waste tanker was used to store non-hazardous waste water.

Three 14,256-gallon tanks were stored beside the hazardous waste tanker (Pictures 32-34). The first tank contained clean solvent brought in by the yellow tanker. The other two tanks contained used oil that would be pumped into a tanker and shipped to refineries in East Chicago, IL and Little Rock, AR.

Beside the tank farm was a 55-gallon hazardous waste SAA drum for Solvent Sludge - Branch Generated (Pictures 35-37).

Records Review

The inspectors requested the training records, the contingency plan, the daily and weekly inspection records, the waste minimization plan, transfer yard tracking log, the 2016-2019 hazardous, non-hazardous, and used oil manifests. The generator status notification (EPA Form 8700-12) was last updated June 25, 2018.

The inspectors requested the training records for the employees handling hazardous waste. Training records for Ralph Boyd, Branch General Manager and Jeremy (JJ) Gulusha, Material Handler were provided. Mr. Gulusha was provided of RCRA Review Safety Kleen site specific e-training training on January 24, 2018 and January 23, 2019. The inspectors also reviewed the job title and descriptions for both employees. Both jobs provided duties for hazardous waste and used oil handling.

The inspectors requested the Contingency Plan dated July 2009 for review. The plan included an emergency contact list, a current evacuation map, a fire extinguisher inspection list, a list of emergency response equipment, and documentation (i.e., green return receipt cards, emails) that copies of the contingency plan were provided to the local emergency response agencies (i.e., fire, police, hospital) were available.

In addition, the updated regulation under the Generator Improvement Rule, requires that the generator amending its contingency plan submit a Quick Reference Guide of the contingency plan to the local emergency responders to have the following information:

(1) The types/names of hazardous wastes in layman's terms and the associated hazard associated with each hazardous waste present at any one time (e.g., toxic paint wastes, spent ignitable solvent, corrosive acid);
(2) The estimated maximum amount of each hazardous waste that may be present at any one time;
(3) The identification of any hazardous wastes where exposure would require unique or special treatment by medical or hospital staff;
(4) A map of the facility showing where hazardous wastes are generated, accumulated and treated and routes for accessing these wastes;
(5) A street map of the facility in relation to surrounding businesses, schools and residential areas to understand how best to get to the facility and also evacuate citizens and workers;
(6) The locations of water supply (e.g., fire hydrant and its flow rate);
(7) The identification of on-site notification systems (e.g., a fire alarm that rings off site, smoke alarms); and
(8) The name of the emergency coordinator(s) and 7/24-hour emergency telephone number(s) or, in the case of a facility where an emergency coordinator is continuously on duty, the emergency telephone number for the emergency coordinator.

At the time, of the inspection, the current contingency plan had not been updated after May 2017, and the Quick Reference Guide was not required at this time.

The inspectors reviewed the weekly inspection records for 2016-2019 for the HWSA, and the daily inspection records the storage tank/tanker system. In addition, the inspectors reviewed the 10-Day Yard Tracking Logs for a 250-gallon tote label selected from the Warehouse. The inspectors observed the tote was brought in on April 15, 2019 and the tracking noted the generator and the disposal facility. No issues were noted during the review.

The waste minimization plan was requested. The inspectors reviewed the waste minimization certification dated December 16, 2014.

Branch generated hazardous waste manifests were reviewed for 2016-2019. Hazardous waste was shipped to Safety Kleen Systems (EPA ID KYD053348108) in Smithfield, KY. This waste stream generates EPA Waste Codes D001, D006, D008, D018, D039 and D040. The land disposal restriction forms were reviewed.

11) Summary

The inspectors conducted the exit meeting with Mr. Boyd. During this meeting, the EPA and ADEM presented the preliminary results of the inspection. Safety Kleen Systems, Inc. was inspected as a large quantity generator of hazardous waste, the facility was in compliance with some requirements of RCRA.

12) Signed

Paula A. Whiting
Environmental Engineer

Date

Concurrence

Alan A. Annicella
Chief, Land, Asbestos and Lead Section
Chemical Safety and Land Enforcement Branch
Enforcement and Compliance Assurance Division

Date

ATTACHMENT A

SAFETY KLEEN SYSTEMS, INC.

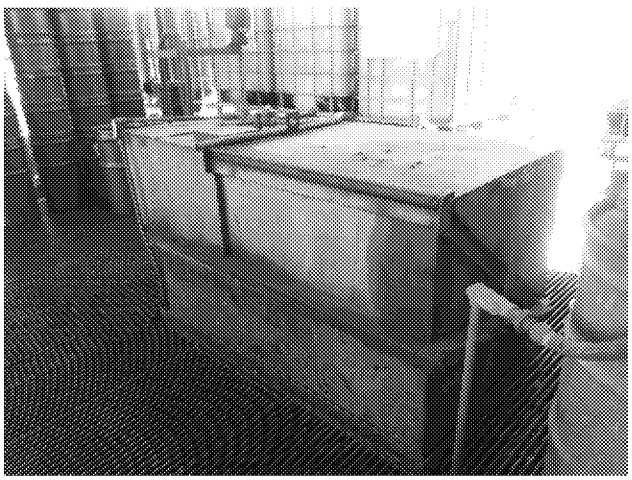
HUNTSVILLE, ALABAMA

COMPLIANCE EVALUATION INSPECTION PHOTOGRAPHS

April 16, 2019

Photos taken by Paula A. Whiting
Camera Type: Samsung J7 SkyPro

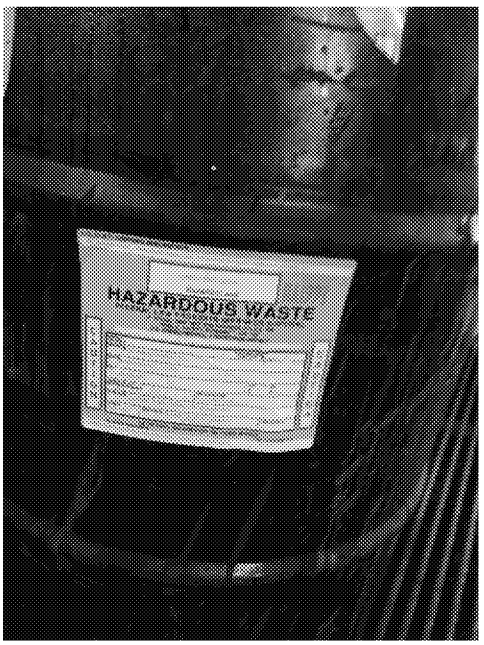
Picture [SEQ Picture * ARABIC] – Dumping Field



Picture [SEQ Picture * ARABIC] – Dump Tank

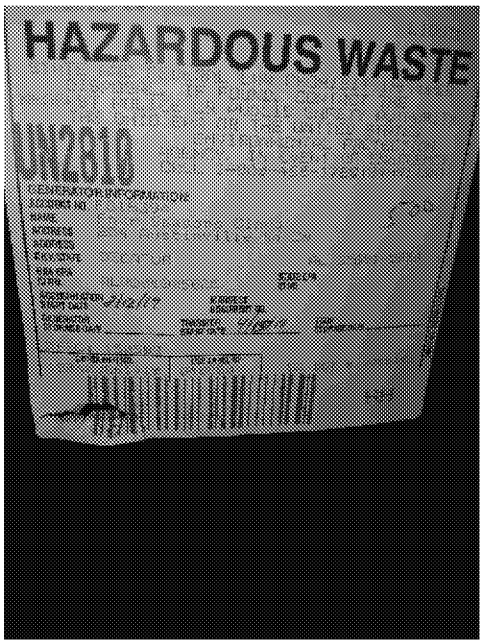
Picture [SEQ Picture * ARABIC] – Dumping Field and Dump Tank

Picture [SEQ Picture * ARABIC] – Dumping Field SAA

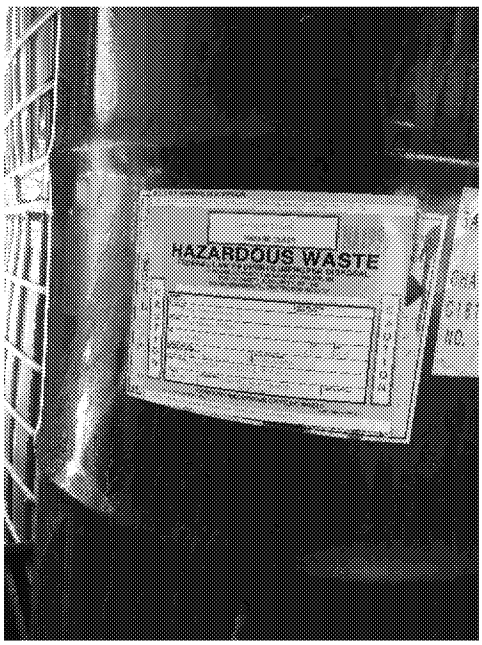


Picture [SEQ Picture * ARABIC] – Dumping Field SAA label

Picture [SEQ Picture * ARABIC] – Dumping Field SAA



Picture [SEQ Picture * ARABIC] – Warehouse label



Picture [SEQ Picture * ARABIC] – Dumping Field SAA labele

Picture [SEQ Picture * ARABIC] – Warehouse

Picture [SEQ Picture * ARABIC] – Warehouse

Picture [SEQ Picture * ARABIC] – Warehouse

Picture [SEQ Picture * ARABIC] – Warehouse incoming drums being processed

Picture [SEQ Picture * ARABIC] – Warehouse incoming drums being processed

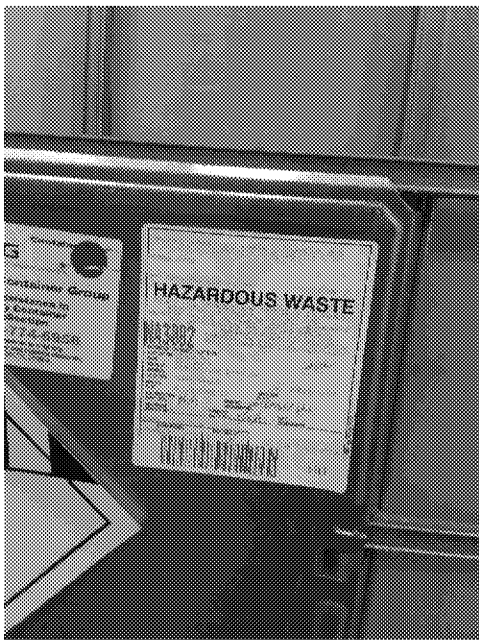
Picture [SEQ Picture * ARABIC] – Warehouse incoming drums being processed

Picture [SEQ Picture * ARABIC] – Warehouse incoming drums being processed

Picture [SEQ Picture * ARABIC] – Warehouse universal waste lamps

Picture [SEQ Picture * ARABIC] – Warehouse universal waste lamps

Picture [SEQ Picture * ARABIC] – Warehouse tote



Picture [SEQ Picture * ARABIC] – Warehouse label

Picture [SEQ Picture * ARABIC] – Warehouse used oil filters

Picture [SEQ Picture * ARABIC] – Warehouse used oil filter drums

Picture [SEQ Picture * ARABIC] – Flammable Room and HWSA

Picture [SEQ Picture * ARABIC] – Flammable Room label

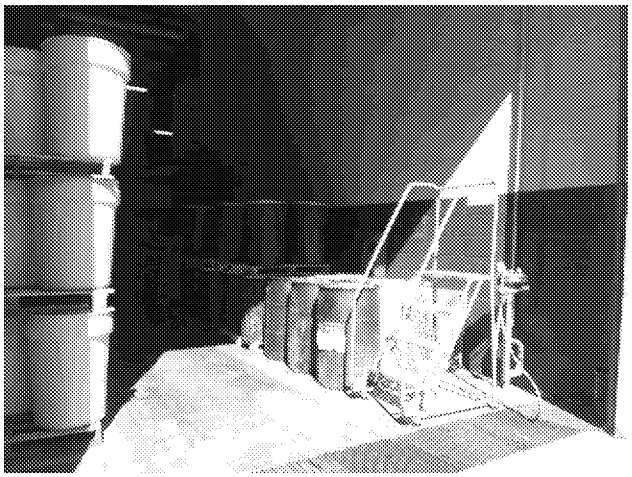
Picture [SEQ Picture * ARABIC] – Flammable Room label

Picture [SEQ Picture * ARABIC] – Flammable Room purged samples

Picture [SEQ Picture * ARABIC] – Flammable Room purged samples

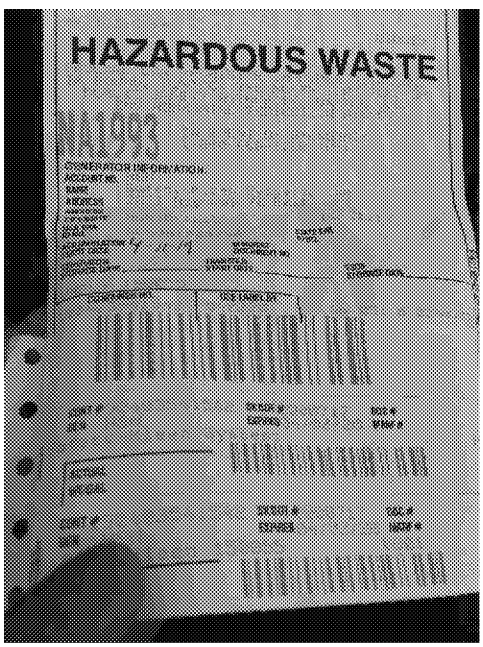
Picture [SEQ Picture * ARABIC] – Flammable Room HWSA

Picture [SEQ Picture * ARABIC] – Flammable Room HWSA

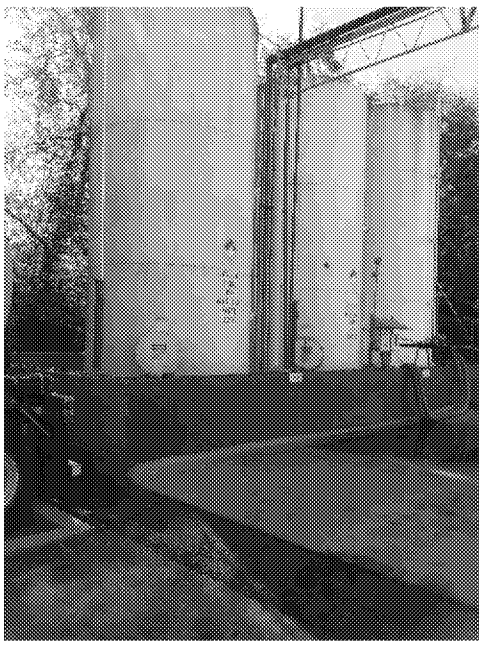


Picture [SEQ Picture * ARABIC] – Warehouse

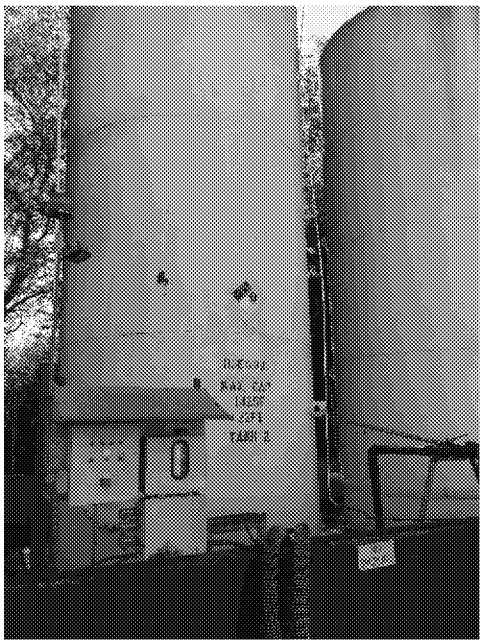
Picture [SEQ Picture * ARABIC] – Tanker Storage



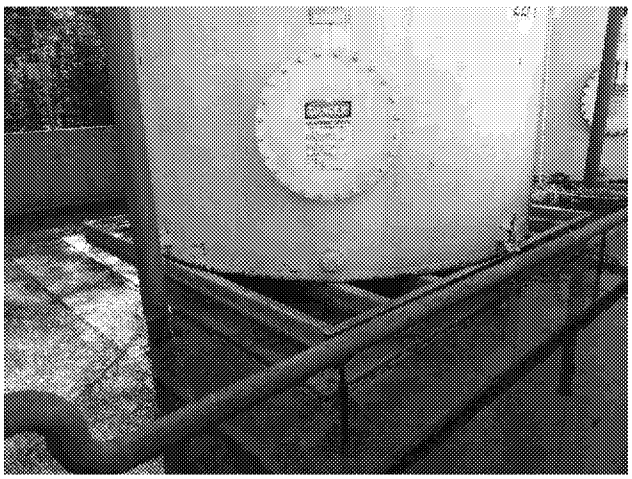
Picture [SEQ Picture * ARABIC] – Tanker Storage label



Picture [SEQ Picture * ARABIC] – Tank Farm



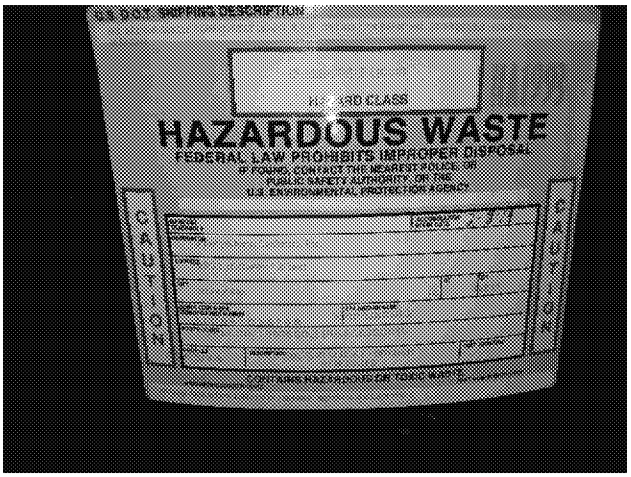
Picture [SEQ Picture * ARABIC] – Tank Farm



Picture [SEQ Picture * ARABIC] – Tank Farm

Picture [SEQ Picture * ARABIC] – Tank Farm SAA

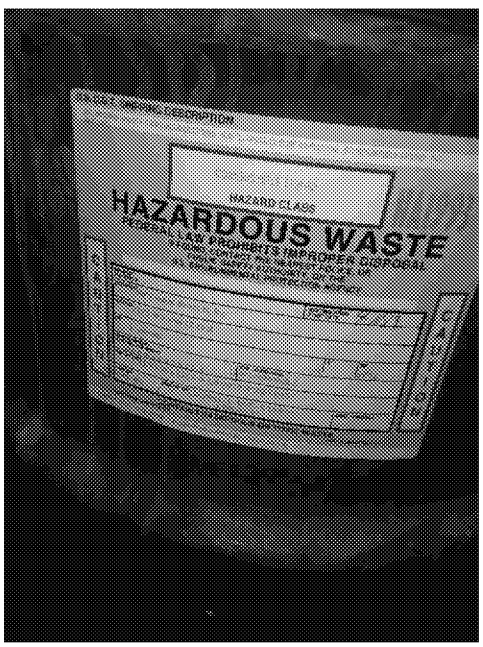
Picture [SEQ Picture * ARABIC] – Tank Farm SAA label



Picture [SEQ Picture * ARABIC] – Flammable Room HWSA label

Picture [SEQ Picture * ARABIC] – Tank Farm used oil drum debris

Picture [SEQ Picture * ARABIC] – Flammable Room HWSA



Picture [SEQ Picture * ARABIC] – Tank Farm SAA label